

REMARKS

Claims 1-20 are pending in this application. Claims 1, 11-12, 14, 16 and 19-20 are amended.

The claims have been amended for clarity and do not require the Examiner to conduct another search. This amendment is filed under and is in compliance with 37 C.F.R § 1.116. Applicants respectfully request entry of this amendment in the above-indicated matter and further request the Examiner to reconsider and withdraw all outstanding grounds of rejection. Applicants respectfully request allowance of the application.

The Office Action rejects under 35 U.S.C. 103(a) claims 1-6, 8-9, 11-15 and 18-19 as being unpatentable over Jones et al., U.S. Patent No. 6,493,731 (hereinafter *Jones*). The Office Action rejects under 35 U.S.C. 103(a) claims 7 and 20 as being unpatentable over *Jones* in view of “W3C’s XML 1.0.” The Office Action rejects under 35 U.S.C. 103(a) claim 10 as being unpatentable over *Jones* in view of Tabb et al., U.S. Patent No. 5,603,025 (hereinafter *Tabb*). The Office Action rejects under 35 U.S.C. 103(a) claims 16 and 17 as being unpatentable over *Jones* in view of “XML Programming with C++.”

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, finally the prior art reference (or references when combined) must teach or suggest all the claim limitations. MPEP § 706.02 (j).

Applicants respectfully submit that the Office Action does not establish a prima facie case of obviousness since *Jones* does not disclose or suggest all of the features of the claimed invention. For example, *Jones* does not disclose or suggest “the metadata in the sub-identifier field including linking data generated by the secondary transaction to link the secondary transaction to the active document, wherein the linking data generated by the secondary transaction is used to update the active document if the second transaction has been updated” as recited, among other features, in independent claim 1, as presented.

The Applicants disagree that the fact that *Jones* discloses that document metadata which is used to record resources referenced while the content of the document is developed would make it obvious that the metadata could be used to update an active document if a secondary transaction has been updated, as claimed. The MPEP clearly states that the teaching or suggestion to make the claimed combination or modification and the reasonable expectation of success must both be found in the prior art, and not based on the applicant’s

disclosure. The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. MPEP § 2143.01.

Nowhere in *Jones* is it taught or suggested that the metadata could be used to update a parent document if a secondary document is updated, as suggested in the Office Action. In contrast, *Jones* repeatedly states that the resources recorded in the document metadata and the content of the document are simultaneously displayed on a user interface of the document management system to provide context for understanding document history. See e.g., Abstract, Col. 3, lines 1-12, and Col. 6, lines 47- 56.

As suggested in paragraph 8 of the Office Action, the mere fact that the resource secondary transaction acts as metadata towards the active document task does not imply that any data generated or modified at the secondary transaction document would update the active document via the linked relationship when *Jones* clearly states repeatedly that the resources identified in the metadata of the document provide context for understanding the documents history. See, Col. 3, lines 7-12 and Abstract. The suggested modification must be shown to exist in the prior art and cannot be based on the Applicant's own disclosure, as provided by the MPEP.

Therefore, *Jones* does not disclose or suggest that "the metadata...including linking data ...wherein the linking data generated by the secondary transaction is used to update the active document if the second transaction has been updated" as claimed.

Based on the above, Applicants respectfully submit that the Office Action fails to establish a *prima facie* case of obviousness with respect to the claimed invention as required by MPEP § 706.02 (j). Applicants respectfully submit that independent claim 1 is patentably distinguishable over the applied art for at least the reasons indicated above and is in condition for allowance.

As presented, independent claim 11 recites, among other features "creating a parent transaction resource, wherein the parent transaction resource represents a parent transaction and is linked to data generated by a secondary transaction and wherein the data generated by the secondary transaction is used to update the active document if the secondary transaction is updated." Applicants submit that the applied references do not disclose or suggest at least this feature of independent claim 11 (amended). As admitted in the Office Action at paragraph 4, *Jones* does not specifically teach that changes to the secondary document update the data fields in the parent document task. Moreover, as described above with respect to independent claim 1, it would not have been obvious to modify *Jones* to include this feature

since no suggestion or motivation exists in *Jones* for one of ordinary skill in the art to make such modification. Therefore, independent claim 11 is in condition for allowance.

Independent claim 18 recites, among other features “updating the parent transaction resource with the transaction specific data from the secondary transaction resource, wherein any changes to the transaction specific data are made to the data fields in the parent transaction resource...”. Applicants submit that the applied references do not disclose or suggest at least this feature of independent claim 18. As admitted in the Office Action at paragraph 4, this feature, for example, is not taught or suggested in *Jones*. Moreover, as described above with respect to independent claim 1, it would not have been obvious to modify *Jones* to include this feature since no suggestion or motivation exists in *Jones* for one of ordinary skill in the art to make such modification. Therefore, independent claim 18 is in condition for allowance.

Claims 2-10 depend from independent claim 1, claims 12-17 depend from independent claim 11, and claims 19-20 depends from independent claim 18. Therefore, claims 2-10, 12-17 and 19-20 are allowable for the reasons stated above with respect to the claim from which they depend, and for the additional features recited therein.

In view of the above, Applicants respectfully request reconsideration, withdrawal of the rejection of claims 1-20 under 35 U.S.C. § 103(e), and allowance of the claims.

CONCLUSION

In view of the above amendments and remarks, Applicants believe that all of the objections and rejections against this application have been fully addressed and that the application is now in condition for allowance. Therefore, withdrawal of the outstanding objections and rejections and a notice of allowance for the application is respectfully requested.

It is believed that no extensions of time or fees are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fees required (including fees for net addition of claims) are hereby authorized to be charged to Hewlett-Packard Development Company's deposit account no. 08-2025.

If the Examiner believes that a personal or telephonic interview would be of value in expediting the prosecution of this application, the Examiner is hereby invited to telephone the undersigned counsel to arrange for such a conference.

Respectfully submitted,

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